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Attorney for Plaintiffs/Counterclaim Defendants  
Rolls-Royce Motor Cars Limited  
and Rolls-Royce Motor Cars NA, LLC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**ROLLS-ROYCE MOTOR CARS  
LIMITED and ROLLS-ROYCE  
MOTOR CARS NA, LLC,**

**PLAINTIFFS/COUNTERCLAIM  
DEFENDANTS,**

v.

**ONE SOURCE TO MARKET, LLC  
d/b/a HEXCLAD,**

**DEFENDANT/COUNTERCLAIM  
PLAINTIFF.**

Civil Action No. 2:23-cv-08387-EP-JSA

**NOTICE OF MOTION TO DISMISS  
DEFENDANT'S COUNTERCLAIM  
FOR DECLARATORY JUDGMENT**

TO: Mark P. Misthal, Esq.  
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*Attorneys for Defendant/Counterclaim Plaintiff One Source to Market, LLC d/b/a HexClad*

**PLEASE TAKE NOTICE** that on December 4, 2023, or a date to be set by the Court, Plaintiffs/Counterclaim Defendants Rolls-Royce Motor Cars Limited and Rolls-Royce Motor Cars NA, LLC (collectively, “Rolls-Royce”), by and through its undersigned attorneys Buchanan Ingersoll & Rooney PC and Kelly IP, LLP, will move before the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for the entry of an Order dismissing with prejudice the counterclaims of Defendant/Counterclaim Plaintiff One Source to Market, LLC d/b/a HexClad’s (“HexClad”) in this action.

**PLEASE TAKE FURTHER NOTICE** that, in support of this Motion, as the Court’s Text Order of October 31, 2023 directed (DE 30), Rolls-Royce will rely on the *accompanying* Brief, as well as all other papers and pleadings on file in this matter.

**PLEASE TAKE FURTHER NOTICE** that a Certification attesting to the date and manner of service is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Respectfully submitted,

Dated: November 2, 2023

**BUCHANAN INGERSOLL & ROONEY PC**

By: /s/ Christopher J. Dalton

Christopher J. Dalton

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**Attorneys for Plaintiffs/Counterclaim**

**Defendants Rolls-Royce Motor Cars Limited**

**and Rolls-Royce Motor Cars NA, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I served the foregoing notice of motion, brief in support, and proposed form of order were upon all counsel registered to receive Notices of Electronic Filing via the Court's CM/ECF system.

Dated: November 2, 2023

/s/ Christopher J. Dalton